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Sent: Tuesday, September 20, 2016 1:20 PM
To: Ramona Hedges
Cc: Anderson, Jim: (James.O.Anderson@p66.com)
Subject: Phillips 66 Comments on Staff Report and Documents for Approval of Rail Spur Extension Project

Members of the Planning Commission

Attention: Ramona Hedges, Planning Commission Secretary

Dear Commissioners,

Phillips 66 is reviewing the documents prepared by staff to support approval of the Rail Spur Extension Project. We intend to provide comments shortly regarding the proposed conditions, finding, and related documents. For the most part, our comments are aimed at improving clarity, completeness, and compliance with CEQA's requirements for findings and project approval, and demonstrating flexibility. In addition, we have comments on a handful of proposed conditions, specifically, 21, 26, 27, 31, 33, 35, 73, 76, 94, and 95.

In light of the short amount of time remaining prior to the hearing, and while we work to complete the letter, I would like to highlight the items that will be the top priorities in Phillips 66's comments:

- **Coastal Access:** The Evidence supports a Planning Commission determination that coastal access is not appropriate at this location, contrary to the staff report, conditions and findings, which would require decent led public access. We request that the Planning Commission find that coastal access at this location would be contrary to protection of public safety and fragile coastal resources.
- **Lighting Evaluation and Restrictions on Lighting at the Existing Refinery:** Lighting at the existing facility will not change as a result of the project, and the EIR found no adverse impact associated with the existing lighting. Therefore, Condition 21 is inappropriate. It also may compromise worker safety, by requiring existing lighting to be reduced to the "minimum" allowed by law.
- **Truck Emission Standards and Average Daily Truck Traffic:** Condition 33 should be expanded to apply the emission standards and daily trip limit to trucks delivering crude oil and other feedstocks to the refinery, rather than prohibiting such deliveries.
- **GHG Emission Offsets:** By requiring on-site emissions to be offset to zero, rather than to the CEQA significance threshold, the County would be departing from standard practice, in what is clearly a transparent effort to make up for federal preemption of a requirement to offset off-site, mainline rail emissions.
- **The Statement of Overriding Considerations** should be expanded to include other values identified by the commissioners during deliberations.

We will offer clear and concise recommendations for each area that we believe requires clarification or edits. We will deliver the complete letter as soon as it is completed.

Regards,

Jocelyn Thompson

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